



Board of Forestry and Fire Protection
Attn: Kevin Conway, Staff Forester
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RE: Comments on "Forest Fire Prevention Pilot Project Exemption" – Proposed revisions to slash treatment requirements

Dear Chair Gilless and Board Members:

We urge the Board of Forestry to adopt the proposed revisions to the slash treatment requirements for the "Forest Fire Prevention Pilot Project Exemption" (Pilot Project Exemption) as noticed by the Board on September 12. We also encourage the Board to adopt the change to the rule that includes the coastal counties as authorized AB 2142.

The proposed revision would increase the maximum allowed post-logging slash height from 9 inches to 18 inches, and would modify the timing for slash treatments for operations that occur later in the season. The Pilot Project Exemption is intended to encourage landowners to remove smaller diameter trees and fuel ladders in an effort to decrease the threat of catastrophic wildfires that have been so destructive to our forests, our water resources and the surrounding communities.

One of the main barriers for landowners to participate in the Pilot Project Exemption is the liability of the removal of slash. The vast majority of this material will be removed and piled at landings. In many areas in need of thinning, biomass markets are not available. The slash material, created by the thinning projects, is currently a significant cost barrier to the landowner who would participate in the Pilot Project. Imposing the additional standard to lop remaining slash to a 9-inch depth would prevent many landowners from utilizing this Pilot Project Exemption.

An 18-inch maximum slash depth standard combined with a lengthier time period to burn the piles will reduce treatment costs and create flexibility to ensure landowners are able to utilize the Exemption to create meaningful change benefit to the landscape and threat to catastrophic wildfire.

California's forests and forest communities are under severe threat of catastrophic wildfire due to the on-going drought, a warming climate and years of over-growth due to lack of sustainable forest management. The Board must create a viable solution for the increased widespread forest fuel-reduction projects for the betterment of the environment and the protection of the communities. The Pilot Project must be functional and economically affordable to landowners as much as possible to ensure homeowners participation.

For these reasons, we strongly encourage the Board to adopt the proposed revisions to the Pilot Project Exemption that have been noticed in the 15-day Notice and to request CalFIRE provide annual reports on its effectiveness.

Thank you for the opportunity to once again comment on this important matter.